

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY

SHANNON PHILLIPS,

*Plaintiff,*

v.

STARBUCKS CORPORATION  
d/b/a STARBUCKS COFFEE  
COMPANY

*Defendant.*

CIVIL ACTION NO.: 2:19-cv-19432

Hon. Joel H. Slomsky, U.S.D.J.

**PLAINTIFF’S OMNIBUS MOTION *IN LIMINE* TO PRECLUDE  
DEFENDANT FROM OFFERING CERTAIN EVIDENCE AT TRIAL**

Plaintiff, Shannon Phillips, by and through her undersigned counsel, hereby moves this Court *in limine* for an Order precluding Defendant, Starbucks Corporation d/b/a Starbucks Coffee Company (“Starbucks” or “Defendant”), from presenting the following at trial: (1) video evidence of the April 12, 2018 arrests (TR-005); (2) documentary or testimonial evidence related to Plaintiff’s May 8, 2018 settlement demand (TR-026); (3) documentary or testimonial evidence from Defendant’s economic loss expert on any topic for which he is not qualified to render an expert opinion – namely, Plaintiff’s mitigation efforts; and (4) evidence related to Plaintiff’s dismissed and/or withdrawn claims against Defendant.

In support of this Motion, Plaintiff relies on the accompanying Memorandum of Law, which is incorporated herein by reference.

Respectfully submitted,

**CONSOLE MATTIACI LAW, LLC**

Dated: May 15, 2023

By: /s/ Katherine C. Oeltjen  
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